Ms. Linda Hildebrand
Freudenberg - NOK General Partnership
P.O. Box 150
Ligonier, IN 46767

Re: Significant Source Modification No:
113-12104-00023

Dear Ms Hildebrand:

Freudenberg - NOK General Partnership applied for a Part 70 operating permit on December 12, 1996 relating to the operation of rubber product manufacturing process in Plant 1, and the production of automobile parts in Plant 2. An application to modify the source was received on March 23, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

The proposed Significant Source Modification approval will be incorporated into the issued Part 70 permit pursuant to 326 IAC 2-7-10.5(l)(1). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued. An associated Administrative Amendment will be issued to combine this into the Title V permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Linda Quigley at (973) 575-2555, ext. 3284, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
LQ/EVP
cc: File - Noble County
U.S. EPA, Region V
Noble County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT

Freudenberg - NOK General Partnership
Plant 1: 1497 Gerber Street
Plant 2: 1496 Gerber Street
Ligonier, Indiana 46767

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 113-12104-00023	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary rubber product manufacturing process in Plant 1, and an automobile parts production in Plant 2.

Responsible Official:	Linda Hildebrand
Source Address:	Plant 1: 1497 Gerber Street, Ligonier, IN 46767 Plant 2: 1496 Gerber Street, Ligonier, IN 46767
Mailing Address:	P.O. Box 150, Ligonier, IN 46767
Phone Number:	219-894-7184
SIC Code:	3061, 3499
County Location:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

Plant 2

(a) One (1) NMP cold cleaner on the Ford 2.5 Duratec line, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;

(b) One (1) NMP cold cleaner on the 2001 Civic line, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere;

Plant 1

(a) One (1) Chain-on-Edge-Coater, identified as COE #5, with a maximum capacity of 5000 units per hour, using dry filters as control, and exhausting through one (1) stack identified as #5 COE.

The source also consists of the following insignificant activities in Plant 2:

(a) Ford 2.5 Duratec line:
  (1) One (1) roll coater, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;

  (2) One (1) spray booth, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;

(b) 2001 Civic line:
  (1) One (1) spray booth, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere;

(c) I4/I5 line:
(1) One (1) spray booth, with a maximum capacity of 120 units per hour, using no control, and exhausting to the atmosphere;

(d) One enclosed mechanical shot blaster, with a maximum capacity of 400 lb/hr of parts, using no control, and exhausting to the atmosphere.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

(1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.

(2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.

(3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

B.6 BACT Determination for Phase Constructions

That pursuant to 40 CFR 52.21(j)(4), for phase construction projects, the determination of BACT shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than eighteen (18) months prior to commencement of construction of each independent phase of the project.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

(b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this approval;

(3) The Compliance Monitoring Requirements in Section D of this approval;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition.

Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this approval;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(1) One (1) NMP cold cleaner on the Ford 2.5 Duratec line, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;

(2) One (1) NMP cold cleaner on the 2001 Civic line, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Degreasers [326 IAC 8-3-2] [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-2, the owner or operator of the NMP washer cold cleaning facilities on the Ford 2.5 line and the 2001 Civic line shall:

(1) equip the cleaner with a cover;

(2) equip the cleaner with a facility for draining cleaned parts;

(3) close the degreaser cover whenever parts are not being handled in the cleaner;

(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) provide a permanent, conspicuous label summarizing the operation requirements;

(6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(1) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the NMP washers, cold cleaner degreaser facilities on the Ford 2.5 line and the 2001 Civic line shall ensure that the following control equipment requirements are met:

(A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(i) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(ii) the solvent is agitated; or

(iii) the solvent is heated.

(B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one

hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(ii) A water cover when solvent is used is insoluble in, and heavier than, water.

(iii) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(2) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(A) Close the cover whenever articles are not being handled in the degreaser.

(B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(C) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.2 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data

sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: One (1) chain on edge line, identified as COE #5, with a maximum capacity of 5,000 units per hour, using dry filters as particulate matter emission control, and exhausting to stack #5 COE.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the COE #5 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 New Facilities: General Reduction Requirements [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the coating of rubber to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Any change or modification which would increase the potential to emit VOC from coating metal in the emission unit to fifteen (15) pounds per day or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-2-9.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control in COE #5 shall be in operation at all times when the chain-on-edge coater is in operation.

D.2.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (#5 COE) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.3 and D.2.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Freudenberg - NOK General Partnership
Source Address: Plant 1: 1497 Gerber Street, Ligonier, Indiana 46767
Plant 2: 1496 Gerber Street, Ligonier, Indiana 46767
Mailing Address: P.O. Box 150, Ligonier, Indiana 46767
Source Modification No.: SSM 113-12104-00023

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Freudenberg - NOK General Partnership**
Source Location:	**Plant 1: 1497 Gerber Street, Ligonier, Indiana 46767**
	Plant 2: 1496 Gerber Street, Ligonier, Indiana 46767
County:	**Noble**
SIC Code:	**Plant 1: 3061**
	Plant 2: 3499
Operation Permit No.:	**T113-7644-00023**
Operation Permit Application:	**December 12, 1996**
Source Modification No.:	**SSM 113-12104-00023**
Permit Reviewer:	**LQ/EVP**

The Office of Air Management (OAM) has reviewed a modification application from Freudenberg - NOK General Partnership relating to the operation of:

Plant 2

(a) One (1) NMP cold cleaner on the Ford 2.5 Duratec line, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;

(b) One (1) NMP cold cleaner on the 2001 Civic line, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere;

Plant 1

(a) One (1) Chain-on-Edge-Coater, identified as COE #5, with a maximum capacity of 5000 units per hour, using dry filters for particulate matter emissons control, and exhausting through one (1) stack identified as #5 COE.

Insignificant Activities

The application also includes the following insignificant activities as defined by 326 IAC 2-7-1(21)(A) and 326 IAC 2-7-1(21)(B). The VOC potential emissions are less than ten (10) tons per year and PM10 potential emissions are less than twenty five (25) pounds per day:

Plant 1

(a) Ford 2.5 line:
  (1) One (1) roll coater, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;

  (2) One (1) spray booth, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;

(b) 2001 Civic line:
  (1) One (1) spray booth, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere;

(c) I4/I5 line:
  (1) One (1) spray booth, with a maximum capacity of 120 units per hour, using no control, and exhausting to the atmosphere;

(d) One enclosed mechanical shot blaster, with a maximum capacity of 400 lb/hr of parts, using no control, and exhausting to the atmosphere.

History

On March 23, 2000, Freudenberg-NOK General Partnership submitted an application to the OAM requesting to add additional surface coating lines to their existing plant. Freudenberg-NOK General Partnership submitted a Part 70 permit application (T113-7644-00023) on December 12, 1996 which is currently under OAM's review.

Source Definition

Freudenberg - NOK company consists of two (2) plants:

(a) Plant 1 is located at 1497 Gerber Street, Ligonier, Indiana 46767; and

(b) Plant 2 is located at 1496 Gerber Street, Ligonier, Indiana 46767.

The two (2) plants are located on contiguous properties and are owned by one (1) company, but have different SIC codes. Plant 2 produces painted automobile parts made from the rubber components manufactured by Plant 1. Due to this support function, they are considered one (1) source.

Existing Approvals

The source has been operating under previous approvals including, but not limited to the following:

(a) CP 113-2288, ID 113-00023, issued on August 2, 1994;

(b) R 113-3358, ID 113-00023, issued on November 2, 1994;

(c) CP 113-4591, ID 113-00023, issued on December 14, 1995;

(d) R 113-4906, ID 113-00023, issued on April 30, 1996;

(e) E 113-5198, ID 113-00023, issued on February 12, 1996;

(f) R 113-8224, ID 113-00023, issued on April 18, 1997;

(g) R 113-9303, ID 113-00023, issued on January 12, 1998;

(h) E 113-9315, ID 113-00023, issued on February 6, 1998;

(i) R 113-10131-00023, issued on September 11, 1998.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (^{0}F)
#5 COE	COE #5	25	24	5,000	ambient

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 23, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 - 4).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	64
PM-10	64
SO_2	--
VOC	23.9
CO	--
NO_x	--

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
formaldehyde	less than 10
glycol ethers	less than 10
TOTAL	less than 25

Justification for Modification

The Title V permit is being modified through a Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4) because potential PM-10 emissions are greater than 25 tons per year.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	4.6
SO_2	--
VOC	34.4
CO	--
NO_x	--
HAP (specify)	--

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-10	attainment or unclassifiable
SO_2	attainment or unclassifiable
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) is not applicable to this source because a non-chlorinated solvent cold cleaner is used. No other NESHAPs apply to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 the particulate matter (PM) from emissions shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

(1) Based on the formula, the mechanical shot blaster which has a maximum process weight rate of 700 pounds per hour (0.35 tons per hour) has the allowable emissions of $E = (4.10)0.35^{0.67} = 2.03$ lb/hr.

potential uncontrolled emissions for the shot blaster $= \frac{(0.004\text{ lb PM})(300\text{ lb media})}{(\text{lb media})\quad(\text{hr})} = 1.2$ lb/hr

The uncontrolled emission of 1.2 lb/hr is less than the allowable emission of 2.03 lb/hr, therefore this facility complies with this limit without the benefit or necessity of any add-on emission control equipment.

(2) The dry filters shall be in operation at all times the COE #5 is in operation in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 (BACT) does not apply to COE#5 because the potential to emit VOCs is less than 25 tons per year. No other 326 IAC 8 rules apply to this line.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 does not apply to this source because the potential to emit VOCs from organic solvents is less than 100 tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

326 IAC 8-2-9 does not apply to this source because the potential to emit VOCs from the surface coating of metal is less than fifteen (15) pounds per day.

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, the owner or operator of the NMP washer cold cleaning facilities on the Ford 2.5 line and the 2001 Civic line, shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the NMP washers, cold cleaner degreaser facilities on the Ford 2.5 line, and the 2001 Civic line, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The one (1) chain-on-edge line has applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (S-1) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters for the one (1) spray booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this rubber product manufacturing process in Plant 1, and the production of automobile parts in Plant 2 shall be subject to the conditions of the attached proposed Significant Source Modification No. 113-12104-00023.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Freudenberg - NOK
Address City IN Zip: 1497 and 1496 Gerber Street, Ligonier, IN 46767
CP#: SSM 113-12104-00023
Plt ID: 113-00023
Permit Reviewer: LQ/EVP
Date: May 2, 2000

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % Glycol Ethers	Formaldehyde Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
PLANT 1 (SIC 3061) COE #5							
Chemlok 8007	9.8	0.001430	5000.00	1.00%	3.00%	3.07	9.21
Total State Potential Emissions						**3.07**	**9.21**

Worst Single HAP = **9.21**
Total HAPs = **12.28**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Particulate Matter and PM_{10}
From Mechanical Shot Blasting Operation

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 1497 and 1496 Gerber Street, Ligonier, IN 46767
CP: SSM 113-12104-00023
Plnt ID: 113-00023
Reviewer: LQ/EVP
Date: May 2, 2000

Blast Rate = 300 lb/hr
Media density = 298 lb/ft3 (steel)

lbs per hour cleaned = 400 lb/hr parts

Emission Factors: PM: 0.0040 lb PM/lb media
PM_{10}: 0.0032 PM_{10}/lb media

Particulate Emissions:

$$PM = \frac{(0.0040 \text{ lb PM})(300 \text{ lb media})}{(\text{lb media})\quad(\text{hr})} = 1.2 \text{ lb/hr}$$

$$PM_{10} = \frac{(0.0032 \text{ } PM_{10})(300 \text{ lb media})}{(\text{lb media})\quad(\text{hr})} = 1.03 \text{ lb/hr}$$

Potential Emissions:

$$PM = \frac{(1.2 \text{ lb})(8{,}760 \text{ hr})(\frac{1 \text{ ton}}{2{,}000 \text{ lb}})}{(\text{hr})\quad(\text{yr})} = 5.3 \text{ tons/yr}$$

$$PM_{10} = \frac{(1.03 \text{ lb})(8{,}760 \text{ hr})(\frac{1 \text{ ton}}{2{,}000 \text{ lb}})}{(\text{hr})\quad(\text{yr})} = 4.5 \text{ tons/yr}$$

Appendix A: Emission Calculations

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 1496 and 1496 Gerber Street, Ligonier, IN 46767
CP: SSM 113-12104-00023
Plt ID: 113-00023
Reviewer: LQ/EVP
Date: May 2, 2000

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	Ford Line Surface Coating	2001 Civic Line Surface Coating	I4/I5 Line Surface Coating	Mechanical Shot Blasting	COE #5 Surface Coating	**TOTAL**
PM	2.17	3.94	3.94	5.30	49.57	64.9
PM10	2.17	3.94	3.94	4.50	49.57	64.1
SO2	0.00	0.00	0.00	0.00	0.00	0.0
NOx	0.00	0.00	0.00	0.00	0.00	0.0
VOC	5.45	6.00	0.20	0.00	12.28	23.9
CO	0.00	0.00	0.00	0.00	0.00	0.0
total HAPs	0.00	0.00	0.00	0.00	12.28	12.3
worst case single HAP	0.00	0.00	0.00	0.00	9.21	9.2

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	Ford Line Surface Coating	2001 Civic Line Surface Coating	I4/I5 Line Surface Coating	Mechanical Shot Blasting	COE #5 Surface Coating	**TOTAL**
PM	2.17	3.94	3.94	5.30	49.57	64.9
PM10	2.17	3.94	3.94	4.50	49.57	64.1
SO2	0.00	0.00	0.00	0.00	0.00	0.0
NOx	0.00	0.00	0.00	0.00	0.00	0.0
VOC	5.45	6.00	0.20	0.00	12.28	23.9
CO	0.00	0.00	0.00	0.00	0.00	0.0
total HAPs	0.00	0.00	0.00	0.00	12.28	12.3
worst case single HAP	0.00	0.00	0.00	0.00	9.21	9.2

Total emissions based on rated capacity at 8,760 hours/year, after control.